

Appl. No. 10/065,596
Amdt. Dated 29 September 2005
Reply to Office action of 7 September 2005

REMARKS/ARGUMENTS

Applicant appreciates the consideration shown by the Office, as evidenced by the Office Action, mailed on 7 September 2005. In that Office Action, the Examiner objected to the drawings, rejected claims 1-3, 5-7, 9, 13, 21, 22, and 26 under 35 USC 103(a) over Takakado et al. US5237260 (hereinafter "Takakado") in view of Julian et al. US5852558 (hereinafter "Julian") and Glennon US4507724, rejected claim 4 under 35 USC 103(a) on Takakado, Julian, and Glennon, and further in view of Lakey et al. US4883973, rejected claim 14 under 35 USC 103(a) on Takakado, Julian, and Glennon, and further in view of Geis et al., US5903116, rejected claims 10, 12, and 23 under 35 USC 103(a) on Takakado, Julian, and Glennon and further in view of Stanton et al. US4179729, rejected claims 8 and 15 under 35 USC 103 (a) on Takakado, Julian, and Glennon and further in view of Nguyen US6067237, and rejected claims 11 and 24 under 35 USC 103(a) on Takakado, Julian, and Glennon and further in view of ordinary skill in art.

After consideration of the Office Action, claim 26 has been amended. Claims 16-20, 25, and 27 had been canceled previously. Claims 1-15, 21-24, and 25 remain under consideration in the present application. Applicant respectfully requests reconsideration of the application by the Examiner in light of the above amendment and the following remarks offered in response to the Office Action.

Objection to the drawings

When reviewing the drawing objection, Applicant realized that Applicant had made a further typing error in dependent claim 26. Applicant has amended claim 26 to be consistent with FIG. 1 and requests that the drawing objection be withdrawn.

Claims define allowable subject matter over the applied art

Applicant traverses the rejection of claims 1-3, 5-7, 9, 13, 21, 22, and 26 under 35 USC 103(a) over Takakado, Julian, and Glennon.

With respect to Takakado, as stated in the Office Action, Takakado does "not disclose explicitly showing that the inverter disclose having a neutral output." Each of the independent claims, as amended, has a corresponding recitation.

- claim 1: wherein in an operational mode, the combined rectifier and inverter provide generated power to the load port and generates a neutral output, wherein one of the legs of the inverter is electrically coupled directly to the neutral output.
- claim 21: a neutral output coupled directly to one of the legs of the inverter ...

The Office action has cited both Julian and Glennon with respect to the neutral output. However, neither includes a leg coupled directly to the neutral.

With regard to Julian, as Applicant stated in the Amendment mailed 5 August 2005:

The Office Action has cited Julian with an assertion that Julian describes "on the leg of the inverter being connected to a neutral point 34 (see figure 1; column 6, lines 31-38)." However, Applicant submits that in Julian it is not the inverter being coupled to the neutral but instead the motor. As can be seen in FIG. 1 of Julian, all four legs of the inverter 20 are coupled to an LC filter 72 which in turn provides the three legs for the motor load 22. No leg is being described being coupled directly to a neutral output. In Column 6, lines 31-38, of Julian it is the motor windings which are described as being

Appl. No. 10/065,596
Amdt. Dated 29 September 2005
Reply to Office action of 7 September 2005

connected at the neutral point – not the inverter.

In response to Applicant's remarks, the present Office Action states: "Julian et al shows in figure 1, leg with switching elements S4, 56, 57 being connected through capacitor 38." Applicant still continues to submit that the inverter legs of Julian are coupled to the motor which is what is coupled to the capacitor and in turn the neutral. Thus it is the motor which is coupled with the neutral – not the inverter. Furthermore, with respect to claim 1, Applicant does not see any way that the Julian inverter could be described as one that "generates a neutral output."

With regard to Glennon (newly cited), the Office Action states: "Glennon has been further cited, for the purpose of preventing returns of regenerative currents develop by the load that it is well known in the art to have a fourth leg an inverter (elements Q7, Q8) being coupled to a neutral via neutral bus line 30." Applicant traverses this statement on the grounds that bus line 30 of Glennon is not coupled to ground. Instead, bus line 30 couples switches Q7 and Q8 to bus filter 14 (the DC link) which is in turn coupled to DC source 10 which itself is grounded. The voltage on the right hand side of bus filter 14 is different than that on the left, and there is no inverter leg coupled to a neutral. Furthermore, with respect to claim 1, Applicant does not see any way that the Glennon inverter could be described as one that "generates a neutral output."

Therefore, Applicant respectfully submits that a prima facie case of obviousness is not present for claims 1 and 21 and that the applied references do not teach, suggest, or disclose (either individually or in combination) the recitations of independent claims 1 and 21 and of dependent claims 2-3, 5-7, 9, 13, 22, and 26 which depend from one of the aforementioned independent claims.

The remaining dependent claims 4, 8, 10-12, 14-15, and 23-24 were each rejected under 35 USC 103(a) on Takakado and Julian in view of other references directed to aspects other than the neutral output. Claims 4, 8, 10-12, 14-15, and 23-24 are likewise believed to be in condition for allowance regardless of whether the other references describe the other aspects.

Summary

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Should the Examiner believe that anything further is needed to place the application in even better condition for allowance, the Examiner is requested to contact applicant's undersigned representative at the telephone number below.

Respectfully submitted,

By Ann M. Agosti
Ann M. Agosti
Reg. No. 37,372
General Electric Company
Building K1, Room 3A66
One Research Circle
Niskayuna, New York 12309
Telephone: (518) 387-7713